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MEMORANDUM ENDORSEMENT

June 30, 2020

VIA ECF

Hon. Gabriel W. Gorenstein
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Courtroom 6B
New York, New York 10007

Re: Joint Motion for Adjournment of Settlement Conference
Lead Case Caption: Sai Marine Export Pvt Limited v. Maersk Line A/S
Lead Case No.: 1:19-cv-11364-PAE
Member Case: Liberty Specialty Markets Limited et al v. Maersk, Inc. et al.
Member Case No. 1:19-cv-11373-PAE

Dear Judge Gorenstein,

We represent Plaintiff, Liberty Specialty Markets Limited a/s/o Express, Inc. and Express, LLC (hereinafter "Plaintiff"), in the above-referenced case. Pursuant to Your Honor's Individual Practices ¶¶ 1(A) and 1(F) and Order Scheduling Settlement Conference [D.E. 24], this letter-motion is submitted jointly along with counsel for Co-Plaintiff, Sai Marine Export Pvt Limited, and Defendants, Maersk, Inc., Maersk Line A/S, Maersk Line, Limited, and Maersk Line India Pvt Ltd, who consent to the relief requested herein.

Counsel for all Parties respectfully request an adjournment of the Settlement Conference that is currently scheduled for July 7, 2020 at 2:30 p.m. Pursuant to Paragraph 8 of the Order [D.E. 24], the requested adjournment is sine die as the Parties require additional time to obtain discovery materials that are critical to assessing potential settlement and resolution of this matter. By way of background, the instant matter arises from alleged damages to shipments of goods at the port of Salalah, Oman during May 2018. Accordingly, the Parties respectfully seek additional time to obtain relevant documents and information prior to conducting a meaningful settlement conference.

We further note that counsel for Co-Plaintiff, Sai Marine Export Pvt. Ltd., has a scheduling conflict on the date that the settlement conference is currently scheduled. In addition, pursuant to Your Honor's Acknowledgement Form, representatives "responsible for giving settlement authority" are required to attend the settlement conference. (See Acknowledge Form ¶ 4 and [D.E. 24] at ¶ 8). Respectfully, the representatives from the Parties are located in the United Kingdom

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and Denmark and the Parties are currently obtaining their availability and will notify the Court as soon as possible.¹

Based on the foregoing, counsel for all Parties respectfully request an adjournment of the Settlement Conference sine die and submit that the requested adjournment will serve the interests of judicial economy.

Should Your Honor have any questions regarding the foregoing, please do not hesitate to contact our office. Thank you for your consideration in this matter.

Respectfully submitted,

SPECTOR RUBIN, P.A.

Andrew Spector


Andrew R. Spector

cc: All Counsel of Record (via ECF)

The application to adjourn the settlement conference sine die is granted. The parties shall write to the Court as soon as they are prepared to participate in a settlement conference. If at that time they wish to request a specific date, they may obtain available dates by calling Chambers. This adjournment has no effect on the parties' obligations to comply with all other orders and deadlines.

So ordered.

Dated: June 30, 2020



GABRIEL W. GORENSTEIN
United States Magistrate Judge

¹ The Parties respectfully note that pursuant to Your Honor's Individual Practices ¶ 1(F), counsel for Plaintiff contacted the Clerk prior to submitting the instant request and obtained alternate dates; however, the Parties' are conferring with their respective clients to obtain availability and will notify the Court as soon as possible.